

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA

v.

EMAD EZZAT

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) Criminal No. 04 mj 00846 MBB  
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**DEFENDANT'S ASSENTED-TO MOTION TO  
MODIFY RELEASE CONDITIONS**

Defendant Emad Ezzat, by and through his attorney, hereby moves the Court to modify the release conditions outlined in the "Order Setting Conditions of Release" dated June 7, 2004 to permit him to travel to Egypt from May 11, 2005 to June 21, 2005. In support of this motion the Defendant states as follows:

1. The United States assents to this motion.
2. Defendant's father, who resides in Cairo, Egypt, is very ill and may not live much longer.
3. Defendant's minor child (daughter, age 8, a U.S. citizen) finishes her school year in late May, and her father needs to pick her up and bring her back to the United States where she will remain until she returns in Egypt later in the summer in time for the next school year.
4. Defendant will provide the Pretrial Services Agency, and the Assistant U.S. Attorney, with all of his flight information and contact information abroad.
5. Defendant has complied fully with all of the release conditions established by the Court.

WHEREFORE, the Defendant respectfully requests that this motion be allowed.

By his attorney,

/s/ Paul V. Kelly  
Paul V. Kelly  
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